1 2 3 4 5 6 7 8 9 10	Miles N. Clark, Esq. Nevada Bar No. 13848 LAW OFFICES OF MILES N. CLARK, LLC 5510 S. Fort Apache Rd, Suite 30 Las Vegas, NV 89148 Phone: (702) 856-7430 Fax: (702) 447-8048 Email: miles@milesclarklaw.com  Shawn Miller, Esq. Nevada Bar No. 7825 KRIEGER LAW GROUP, LLC 5502 S. Fort Apache Rd, Suite 200 Las Vegas, NV 89148 Phone: (702) 848-3855 Email: smiller@kriegerlawgroup.com  Counsel for Plaintiffs Leisa Whittum and Nicole Kilburn	John A. Yanchunis, Esq. (Admitted Pro Hac Vice) Ryan D. Maxey, Esq. (Admitted Pro Hac Vice) MORGAN & MORGAN COMPLEX LITIGATION GROUP 201 N. Franklin Street, 7th Floor Tampa, FL 33602 Phone: (813) 223-5505 Email: jyanchunis@ForThePeople.com Email: rmaxey@ForThePeople.com
12	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
13		
14		
15	LEICA WHITTIM NICOLE VII DUDN	Core No. 2:21 are 01777 MMD FIV
16	LEISA WHITTUM, NICOLE KILBURN, SARA SANGUINETTI, and all similarly	Case No. 2:21-cv-01777-MMD-EJY
17	situated individuals,	Plaintiffs Whittum and Kilburn
18	Plaintiffs,	<i>C/w</i> Case No. 2:21-cv-1779-JAD-EJY
19	V.	Plaintiff Sanguinetti
20	UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA,	STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO FILE REPLY
21	Defendant.	IN SUPPORT OF RENEWED MOTION TO REMAND OR, ALTERNATIVELY, MOTION TO COMPEL
22		[FIRST REQUEST]
23		
24		
25		
26	Plaintiffs Leisa Whittum and Nicole Kilburn ("Plaintiffs"), by and through their counsel of	
27	record, and Defendant University Medical Center of Southern Nevada ("UMC") (collectively, the	
28  KNEPPER & CLARK LLC ATTORNEYS AT LAW 5510 S Fort Apache Rd, Ste 30 Las Vegas, NV 89148 (702) 856-7430		

"Parties") have agreed and stipulated to the following:
1. On September 23, 2022, the Court permitted the Parties to engage in jurisdictional
discovery and for Plaintiffs to re-urge their motion for remand at the conclusion of such discovery.
ECF No. 52.
2. On November 11, 2022, the Court set the briefing on Plaintiffs' re-urged Motion to
Remand for February 22, 2023. ECF No. 55.
3. On February 22, 2023, Plaintiff filed her Renewed Motion to Remand Or,
Alternatively, Motion to Compel. ECF No. 61, 62.
4. On March 8, 2023, UMC filed its response to Plaintiff's Renewed Motion to
Remand Or, Alternatively, Motion to Compel. ECF No. 67.
5. Plaintiffs' Reply in Support is due March 15, 2023.
Plaintiffs and UMC have agreed to extend Plaintiffs' deadline to file a reply in support of
the Motion until Monday, March 20, 2023. This extension will permit Plaintiffs additional
necessary time to consider the authorities and arguments UMC raises in its Response.
This stipulation is made in good faith, is not interposed for delay, and is not filed for an
//
// //

improper purpose. 1 IT IS SO STIPULATED. 2 Dated March 15, 2023 3 LAW OFFICES OF MILES N. CLARK, LLC KOELLER, NEBEKER, CARLSON & HALUCK, LLP 4 /s/ Miles N. Clark 5 Miles N. Clark, Esq. /s/ Mark F. Roach Mark F. Roach, Esq. Nevada Bar No. 13848 6 5510 So. Fort Apache Rd, Suite 30 Nevada Bar No. 8237 Las Vegas, NV 89148 Andrew C. Green, Esq. 7 Email: miles@milesclarklaw.com Nevada Bar No. 9399 8 400 S. 4th Street, Suite 600 KRIEGER LAW GROUP, LLC Las Vegas, NV 89101 9 Shawn Miller, Esq. Email: Andrew.green@knchlaw.com Email: Mark.Roach@knchlaw.com Nevada Bar No. 7825 10 2850 W. Horizon Ridge Parkway, Suite 200 Henderson, NV 89052 11 Counsel for Defendant University of Medical Center of Southern Email: dkrieger@kriegerlawgroup.com Nevada 12 John A. Yanchunis 13 (Pro Hac Vice to be submitted) Ryan D. Maxey 14 (Pro Hac Vice to be submitted) MORGAN & MORGAN 15 COMPLEX LITIGATION 16 GROUP 201 N. Franklin Street, 7th Floor 17 Tampa, Florida 33602 (813) 223-5505 18 iyanchunis@ForThePeople.com rmaxey@ForThePeople.com 19 Counsel for Plaintiff 20 21 ORDER GRANTING STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO FILE 22 REPLY IN SUPPORT OF RENEWED MOTION TO REMAND OR, ALTERNATIVELY, MOTION TO COMPEL 23 IT IS SO ORDERED. 24 GISTRATE JUDGE 25 Dated: March 15, 2023 26 27

KNEPPER & CLARK LLC ATTORNEYS AT LAW 5510 S Fort Apache Rd, Ste 30 Las Vegas, NV 89148 (702) 856-7430

28